

1 ANDREW C. GREEN, ESQ.
Nevada Bar No. 9399
2 DAVID M. GOULD, ESQ.
Nevada Bar No. 11143
3 KOELLER NEBEKER CARLSON & HALUCK, LLP
4 300 S. Fourth St., Suite 500
Las Vegas, NV 89101
5 Phone: (702) 853-5500
6 Fax: (702) 853-5599
Attorneys for Defendant,
7 SAFECO INSURANCE COMPANY OF AMERICA

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 EDWARD STOLZ, an individual,)	CASE NO.: 2:14-cv-02060-RFB-NJK
)	
11 Plaintiff,)	
)	
12 vs.)	STIPULATION AND ORDER TO
)	EXTEND TIME FOR PARTIES TO FILE
13 SAFECO INSURANCE COMPANY OF)	OPPOSITIONS TO MOTIONS FOR
AMERICA, a New Hampshire corporation;)	SUMMARY JUDGMENT
14 DOES I through X, ROE CORPORATIONS)	
15 XI through XX,)	[FIRST REQUEST]
Defendants)	
16)	

17 **COME NOW**, Plaintiff, EDWARD STOLZ, by and through his attorney of record,
18 Matthew M. Pruitt, Esq., of the law firm of ALVERSON, TAYLOR, MORTENSEN &
19 SANDERS and Defendant, SAFECO INSURANCE COMPANY OF AMERICA [hereinafter
20 "Safeco"], by and through its counsel of record, the law firm of KOELLER, NEBEKER,
21 CARLSON & HALUCK, LLP, and hereby stipulate to extend the time for each to file its
22 Opposition to the other's Motion for Summary Judgment in the above-entitled matter.

23 The parties filed dueling Motions for Summary Judgment on January 8, 2016. Per
24 Order of this Court, Oppositions to same are due to be filed today, Monday, February 1, 2016.
25 Given press of business for counsel for the parties, it has been agreed that the time for the
26 parties to file their Oppositions be extended by approximately two (2) weeks. As such, the
27
28

1 parties hereby request an Order from this Court memorializing that Oppositions to each party's
2 Motion for Summary Judgment are now due by or before **Tuesday, February 16, 2016**.¹

3
4 DATED this 1st day of February, 2016. DATED this 1st day of February, 2016.

5 ALVERSON, TAYLOR, MORTENSEN & SANDERS KOELLER, NEBEKER, CARLSON
6 & HALUCK, LLP

7 By /s/ Matthew M. Pruitt
8 MATTHEW M. PRUITT, ESQ.
9 Nevada Bar No. 12474
7401 W. Charleston Boulevard
10 Las Vegas, Nevada 89117
11 Attorneys for Plaintiff,
EDWARD STOLZ

By /s/ David M. Gould
DAVID M. GOULD, ESQ.
Nevada Bar No. 11143
300 South Fourth Street, Suite 500
Las Vegas, NV 89101
Attorneys Defendant,
SAFECO INSURANCE COMPANY OF
AMERICA

12
13 **ORDER**

14 **IT IS HEREBY ORDERED** that the time for each party to file its Opposition to the
15 other party's Motion for Summary Judgment is extended until **Tuesday, February 16, 2016**.
16

17
18 

19 RICHARD F. BOULWARE, II
United States District Judge

20 DATED: February 4, 2016.

21 Respectfully submitted by,

22 KOELLER, NEBEKER, CARLSON
23 & HALUCK, LLP

24 By /s/ David M. Gould
25 DAVID M. GOULD, ESQ.
26 Nevada Bar No. 11143
300 South Fourth Street, Suite 500
27 Las Vegas, NV 89101
Attorneys Defendant,
28 SAFECO INSURANCE COMPANY OF AMERICA

¹ The parties have chosen the included date due to the fact Monday, February 15, 2016, is President's Day and, thus, a federal holiday.